UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ANTHONY RAPP and C.D.,

Plaintiffs,

-against-

KEVIN SPACEY FOWLER a/k/a KEVIN SPACEY,

Defendant.

Case No. 1:20-cv-09586 (LAK) (SDA)

DECLARATION OF CHASE A. SCOLNICK IN SUPPORT OF DEFENDANT'S OPPOSITION TO PLAINTIFF C.D.'S MOTION FOR LEAVE TO PROCEED ANONYMOUSLY

Under 28 U.S.C. § 1746, I, Chase A. Scolnick, declare under penalty of perjury, as follows:

- 1. I am a member of the Bar of the State of New York and a bar of this Court, I am also a partner of Keller / Anderle LLP, attorney for defendant Kevin Spacey Fowler a/k/a Kevin Fowler ("Mr. Fowler").
- 2. This declaration is made in support of Mr. Fowler's Opposition to Plaintiff C.D.'s Motion for Leave to Proceed Anonymously.
- 3. Attached as **Exhibit 1** to this declaration is a true and correct copy of a November 2, 2017 article from *New York* magazine published on its affiliated website, Vulture, *Man Comes Forward to Describe an Alleged Extended Sexual Relationship He Had at Age 14 With Kevin Spacey* (November 2, 2017). The article can be found online at the following link: https://www.vulture.com/2017/11/kevin-spacey-alleged-sexual-relationship.html.
- 4. Attached as **Exhibit 2** to this declaration is a true and correct copy of a print out of screenshots from counsel for Plaintiffs, Peter Saghir's ("Mr. Saghir") attorney profile, on Gair, Gair, Conason, Rubinowitz, Bloom, Hershenhorn, Steignman & Mackauf's website, including a section dedicated to the media called "In the News" providing links to articles featuring statements from counsel. Mr. Saghir's online profile from which this printout derived can be found online at the following link: https://www.gairgair.com/peter-j-saghir.html.

- 5. Attached as **Exhibit 3** to this declaration is a true and correct copy of a September 9, 2020 article from Deadline, *Kevin Spacey Hit With Sexual Assault Suit by 'Star Trek's Anthony Rapp & Anonymous Plaintiff Over Alleged 1980s Attacks*, which was found at a link under "In the News" on Mr. Saghir's attorney profile. Statements from Plaintiffs' counsel from the article are highlighted in the attached exhibit.
- 6. Attached as **Exhibit 4** to this declaration is a true and correct copy of an article from The New York Times, *Kevin Spacey Accused of Sex Offenses Against Teenagers in New Lawsuit*, which was found at a link under "In the News" on Mr. Saghir's attorney profile. The article states it was published on September 9, 2020 and updated on September 11, 2020. Statements from Plaintiffs' counsel from the article are highlighted in the attached exhibit.
- 7. Attached as **Exhibit 5** is a true and correct copy of a September 9, 2020 article from Rolling Stone, *Two Men, Including Anthony Rapp, Sue Kevin Spacey for Alleged Sexual Assault*, which was found at a link under "In the News" on Mr. Saghir's attorney profile.
- 8. Attached as **Exhibit 6** is a true and correct copy of a September 9, 2020 article from Forbes Magazine, *Lawsuit Accuses Kevin Spacey of Sexual Misconduct Against Teenagers in 1980s*, which was found at a link under "In the News" on Mr. Saghir's attorney profile. Statements from Plaintiffs' counsel from the article are highlighted in the attached exhibit.
- 9. Attached as **Exhibit 7** is a true and correct copy of an article from USA Today, *Kevin Spacey Accused in New Lawsuit of Assaulting Two Men When They Were in Their Teens*, which was found at a link under "In the News" on Mr. Saghir's attorney profile. The article states it was published on September 9, 2002 and updated on September 11, 2020.
- 10. Attached as **Exhibit 8** is a true and correct copy of a September 9, 2020 article from New York Daily News, 'He is a pedophile who sexually abused children' disgraced 'House of Cards' actor Kevin Spacey sued for alleged 1980s sex assaults, which was found at a link under "In the News" on Mr. Saghir's attorney profile. Statements from Plaintiffs' counsel from the article are highlighted in the attached exhibit.

2

11. Attached as **Exhibit 9** to this declaration is a true and correct copy of a September 9, 2020 article from *New York* magazine published on its affiliated website, Vulture, *Kevin Spacey Sexually Assaulted Two 14 Year-Old Boys, New Lawsuit Alleges* (September 9, 2020). The article can be found online at the following link: https://www.vulture.com/2020/09/kevin-spacey-sued-for-sexually-assaulted-14-year-old-boys.html#ga=2.55885099.1050017743.1612403904-1014374523.1612403904.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 4, 2021 Irvine, California

/s/ Chase A. Scolnick

Chase Scolnick Keller/Anderle LLP 18300 Von Karman Ave., Suite 930 Irvine, California 92612

Tel.: (949) 476-8700 Fax: (949) 476-0900

E-mail: cscolnick@kelleranderle.com

Counsel for Defendant Kevin Spacey Fowler a/k/a Kevin Spacey